

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE HECKMANN CORPORATION
SECURITIES LITIGATION

Case No. 1:10-cv-00378-LPS-MPT

**UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED SETTLEMENT**

Court-appointed Lead Plaintiff Matthew Haberkorn and proposed class representative Ronald C. Sullivan respectfully move this Court for the entry of an Order: (i) granting preliminary approval of the proposed settlement (the “Settlement”) set forth in the Stipulation of Settlement dated March 4, 2014 (the “Stipulation”); (ii) conditionally certifying the proposed Settlement Class for purposes of settlement; (iii) approving the form and manner of providing notice of the Settlement to the Settlement Class; (iv) setting a hearing date to consider final approval of the Settlement, approval of the plan of allocation, Co-Lead Counsel’s motion for an award of attorneys’ fees and expenses and Lead Plaintiff’s request for reimbursement of costs and expenses in connection with his representation of the Settlement Class; and (v) setting a schedule for various deadlines in connection with the Settlement.

The reasons for this motion are set forth in the accompanying brief, the Stipulation and the exhibits attached thereto. A proposed form of Order is attached hereto as Exhibit A.

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Dated: March 4, 2014

**ROSENTHAL, MONHAIT
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